
**TECHNICAL REVIEW DOCUMENT
FOR
OPERATING PERMIT 95OPCY005**
to be issued to:

Mull Drilling Co.
Sorrento Compressor Station
Cheyenne County
Facility ID 0170005

Geoffrey D. Drissel Review Engineer
Revised for Renewal September 5, 2002

1. Purpose

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued September 1, 1997, and expires on September 1, 2002. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted August 31, 2001. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

2. Source Description

This facility is a natural gas compressor station, classified under the Standard Industrial Classification of 1311, which processes gas to remove liquids and moisture and then reinjects it into the producing reservoir. The facility is located in a flat rural area 6 miles North and 6 miles West of the city of Kit Carson in Cheyenne County, Colorado (NE Section 5, T 14S, R49W). The nearest major road is Highway 40 which is 6 miles South of the facility. Two houses are located within 1 to 2 miles of the compressor station. The state of Kansas has been designated as an affected state located within 50 miles of the facility. There are no federal Class I areas within 100 kilometers of the plant. The area in which the plant operates, Cheyenne County, is designated as attainment for all criteria pollutants.

The source is considered to be a minor source (Potential To Emit (PTE) < 250 Tons Per Year

(TPY)) for purposes of the Prevention of Significant Deterioration (PSD) program. Facility wide emissions are as follows:

<u>Pollutant</u>	<u>Potential To Emit (TPY)</u>	<u>2001 Actual Emissions (TPY)</u>
NOx	180.70	68.5
CO	143.39	47.6
SO ₂	neg	neg
VOC	58.09	28.4
PM	neg	neg
PM ₁₀	neg	neg

Potential emissions are based upon existing Colorado Construction Permit limitations. Actual emissions are based upon Division Inventory System data for the year 2001. Emissions of SO₂, PM, and PM₁₀ are negligible from the equipment at this facility. This facility is required to provide an updated APEN in the event that actual emissions of any of the above air pollutants increase 5 tons per year above the level reported on the last APEN submitted to the APCD.

3. Discussion of Modifications Made

Source Requested Modifications

The source requested that several changes be made to the renewal Operating Permit. Those requested changes consisted of the following:

- removal of hourly emission limits for Units S001, S002 and S003
- revision of the CO emission factor and annual CO emission limits for Units S001, S002 and S003 to reflect the current AP-42 emission factor
- deletion of points S004 and S005
- lowering of the annual VOC emission limit for Unit S007
- inclusion of a new emission point, a crude oil storage tank

These requests have been incorporated into the renewal Operating Permit.

Other Modifications

The Division has included additional changes to make the permit more consistent with recently issued permits, including comments made by EPA on other Operating Permits, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Mull - Sorrento Renewal Operating Permit. These changes are as follows:

Page following Cover Page

The dates for monitoring and compliance periods have been clarified, i.e. changed "September - February" to "September 1- February 28".

Monitoring and compliance periods and report and certification due dates are shown as examples. The appropriate monitoring and compliance periods and report and certification due dates will be filled in after permit issuance and will be based on permit issuance date. Note that the source

may request to keep the same monitoring and compliance periods and report and certification due dates as were provided in the original permit. However, it should be noted that with this option, depending on the permit issuance date, the first monitoring period and compliance period may be short (i.e. less than 6 months and less than 1 year).

The citation (above “issued to” and “plant site location”) on the page following the cover page provides the incorrect title for the state act. The title was changed from “Colorado Air Quality Control Act” to “Colorado Air Pollution Prevention and Control Act”. In addition, the dates were removed from the citation.

Section I - General Activities and Summary

The language in Condition 1.3 was changed based on comments made by EPA on other Operating Permits.

Revised the language in Condition 3.1 to more appropriately address the PSD status of the source.

Added Section 4 that states the applicability of the Accidental Release Prevention Program (112(r)).

Added Section 5 for compliance assurance monitoring (CAM); note that no emission units are subject to CAM.

Section II - Specific Permit Terms

Section II.1.5 and 2.5: Opacity compliance language

- The language regarding the presumption of compliance with the opacity standard if natural gas is used as fuel was updated to reflect the current version.

Section III – Permit Shield

- The title for Section 1 was changed from “Specific Conditions” to “Specific Non-Applicable Requirements” and a new section 3 was added for subsumed (streamlined) conditions. Note that there were no streamlined conditions.
- Based on comments made by EPA on another permit, the following statement was added after the introductory sentence in Section 1 “This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance”.
- In addition, the following phrase “In addition, this shield does not protect the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance” was added to the end of the introductory paragraph in Section 1.
- Based on comments made by EPA on another permit, the following phrase was added to the beginning of the introductory sentence “Based upon the information available to the Division and supplied by the applicant.”

Section IV - General Conditions

- Added an “and” between the Reg 3 and C.R.S. citations in General Condition 4 (compliance requirements).
- The language contained in the Common Provisions Regulation regarding upsets was included in General Condition 3.
- The citation in General Condition 8 (fees) was changed to cite the Colorado Revised Statute. In addition, any specific identification of a fee (i.e. \$100 APEN fee) or citation of Reg 3 was removed and replaced with the language “...in accordance with the provisions of C.R.S. [appropriate citation].”
- The citation in General Condition 14 (odor) was corrected. In addition, the phrase “Part A” was added to the citation for Condition 14 (odor). Colorado Regulation No. 2 was revised and a Part B was added to address swine operations. Colorado Regulation No. 2, Part B should not be included as a general condition in the Operating Permit.
- The reference in Condition 29 (volatile organic compounds) to Regulation No. 7, Section III.C.3 was corrected to Regulation No. 7, Section VIII.C.3.
- Added the requirements in Colorado Regulation No. 7, Section V.B (disposal of volatile organic compounds) to General Condition 29.

Appendices

- First Page of Appendices – The phrase “except as otherwise provided in the permit” was added after the word “enforceable” in the disclaimer at the request of EPA.
- Appendix B and C were replaced with revised Appendices.

The EPA addresses in Appendix D were corrected.